

AT&T supports measures to streamline the Part 43 international reporting requirements as proposed in the April 2004 Notice of Proposed Rulemaking, in addition to the further streamlining measures proposed by the International Bureau staff in 2006 after discussions with U.S. international carriers, as follows:

43.61 report:

- Eliminate the quarterly 43.61 reports, which serve no regulatory purpose now that there is no further need for a safeguard against “one way bypass” following the Commission’s 2004 ISP reforms;
- Integrate all U.S. points & eliminate separate reporting for coterminous U.S., Alaska, Hawaii, Puerto Rico, Guam, Virgin Islands and other U.S. offshore points;
- Eliminate U.S. offshore termination points;
- Eliminate reporting of IMTS messages and retained revenues;
- Eliminate reporting by billing codes;
- Eliminate separate reporting of traditional settlement and ISR traffic;
- Eliminate route by route reporting of transit traffic;
- Not adopt the NPRM proposal for new route by route reporting of retail and wholesale IMTS traffic;
- Not adopt the NPRM proposal to eliminate existing route by route reporting, and to adopt world total reporting, for collect, international 800, country-direct, and country-beyond traffic;
- Require new reporting of world total IMTS data as follows:
 - Minutes and revenues for IMTS resale;
 - Minutes and revenues for facilities-based IMTS;
 - Minutes and revenues for retail mass-market IMTS (including small business IMTS if this data is retained with retail mass-market data);
 - Minutes and revenues for large business customer IMTS;
 - Minutes and revenues for traffic received from other U.S. carriers;
 - Minutes and revenues for traffic received from foreign carriers;
 - Minutes and revenues for transit;
 - Non-route-specific revenues (except that these revenues may be allocated among routes at the reporting carrier’s discretion provided the fact of such allocation is clearly indicated);
- Eliminate reporting of private lines by classes;
- Eliminate reporting of billing and service codes for private lines;
- Not adopt the NPRM proposal for separate reporting of data services;
- Not adopt the NPRM proposal for separate reporting of circuits provided over owned and resold facilities.

43.82 report:

- Eliminate the reporting of submarine cable circuits following the Commission's 2009 reform of international submarine cable circuit regulatory fees eliminating the assessment of fees based on the number of these circuits;¹
 - As the common carrier submarine cable circuits reported under Section 43.82 represent only approximately 10% of total U.S. submarine cable capacity, the collection of this limited data provides no basis for competitive analysis and serves no other remaining regulatory purpose;
- Eliminate service categories (including the proposed new data services category);
- Eliminate reporting of derived circuits.

¹ See *Assessment and Collection of Regulatory Fees for Fiscal Year 2008*, Second Report and Order, 24 FCC Rcd. 4208 (2009).